



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

March 20, 2015

LU-9J

Email and Certified Mail 7009 1680 0000 7621 2507
Return Receipt Requested

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528

Re: *Halowax Area (Area 17) Monitoring Plan* amendment request
Administrative Order on Consent
U.S. EPA ID NO. MID 005 363 114
U.S. EPA Docket No. V-W-89-R-45

Dear Mr. Pinto,

This letter responds to your December 18, 2014 email requesting adjustments to the *Area 17 (Halowax) Monitoring Plan*, dated December 20, 2013. The Area 17 remedy is an interim measure that was installed in 2001 to control and contain NAPL and contaminated groundwater at the northeast portion of the Site.

These elements of your request are approved:

- Reduction of the monitoring frequency from quarterly to biannually (sampling should be scheduled for high water seasons in the spring and fall as proposed, e.g., April and November)
- Removal of MW-03 from the sampling network due to its redundancy with MW-02 and proximity to MW-025, and
- Removal of chromium and lead from the analyte list for IM network wells due to four sampling events resulting in non-detects or concentrations well below criteria.

This element of your request is disapproved:

- Removal of MW-016 from the network.

MW-016 must continue to be sampled to provide a southern/eastern control on groundwater measuring and sampling, and extent of contamination definition.

Please provide EPA with an amended monitoring plan for the Area 17 interim measure

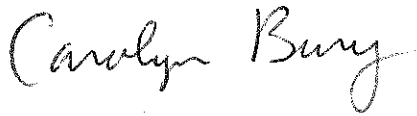
by April 24, 2015. For the amended plan and for future monitoring reports, please revise the figures to include the slurry wall; currently only the sheet pile wall is identified.

An evaluation of the monitoring reports and the interim measure design provided in the December 20, 2013 *Quarterly Monitoring Plan* suggests that an additional well in the northeast corner of the Site, on the east side of the groundwater treatment system piping, would help to identify whether NAPL pools in the area against the east-west and north-south containment walls. Please propose either an additional well or a piezometer at that location for an improved final remedy in the future Corrective Measures Implementation Plan.

In addition, while the December 20, 2013 Quarterly Monitoring Plan provides a summary of the Area 17 interim measure, EPA will need the detailed engineering as-built plans to include the interim measure as a final remedy. Please either refer EPA to such documentation already submitted or provide detailed plans with the future Corrective Measures Implementation Plan documentation.

If you have any questions, please contact me at (312) 886-3020.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn Bury".

Carolyn Bury
Project Manager
Corrective Action Section 2
Remediation and Reuse Branch

Electronic copy: Peter Swanson, Conestoga-Rovers and Associates